

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MOSES PEREZ and DEE PEREZ,

*Plaintiffs,*

v.

K&B TRANSPORTATION, INC., and KIARA  
WHARTON,

*Defendants.*

Case No. 1:17-cv-02610

Honorable Judge Pallmeyer

**Plaintiffs' Supplemental Combined Interrogatories & Requests to Produce to  
Defendants Kiara Wharton and K&B Transportation, Inc.**

Plaintiffs, MOSES PEREZ and DEE PEREZ, by and through their attorneys, COGAN & POWER, P.C. propounds the following Supplemental and Combined interrogatories & requests to produce pursuant to Rule 33 and Rule 34 of the Federal Rules of Civil Procedure to be answered by defendants, Kiara Wharton and K&B Transportation, Inc., under oath within 30 days hereof.

**Supplemental Interrogatories Per Federal Rule of Civil Procedure 33**

1. List all previous addresses of the Defendant, Kiara Wharton for the last ten (10) years.

**Answer:**

2. List all current and previous states in which Defendant, Kiara Wharton has held a driver's license for the past ten (10) years.

**Answer:**

3. Provide all license numbers currently and previously held by Defendant, Kiara Wharton for the past ten (10) years.

**Answer:**

4. State whether Defendant, Kiara Wharton possessed two cell phones on January 20, 2016.

**Answer:**

5. State whether the call made by Kiara Wharton to Matt Tipton concerning the wreck of January 20, 2016 was recorded or transcribed. If said call was recorded or transcribed, please produce the recording pursuant to Rule 34.

**Answer:**

**Supplemental Requests to Produce Per Federal Rule of Civil Procedure 34**

1. Produce unreacted copies of all current and previous licenses held by Defendant, Kiara Wharton in every single state she has been licensed.

**Answer:**

2. Produce all Qualcomm data from the truck driven by Defendant, Kiara Wharton from her date of hiring in June of 2015 through 2016.

**Answer:**

3. Produce all of Kiara Wharton's PayPack records from 2015 through 2016.

**Answer:**

4. Produce all documentation, data and video concerning K&B Transportation training on Federal Motor Carrier Safety Regulation 392.14.

**Answer:**

5. Produce all weather updates, texts, messages or emails sent from K&B Transpiration to Kiara Wharton concerning conditions in the State of Illinois.

**Answer:**

6. Produce all reports created by Matt Tipton concerning the wreck of January 20, 2016.

**Answer:**

7. Produce all reports created by Kiara Wharton and directed to K&B concerning the wreck of January 20, 2016.

**Answer:**

8. Produce all transportation of good contracts and agreements between Tyson Fresh Meats, Inc. and K&B Transportation, and Meijer Inc. and K&B Transportation in effect from 2015 to 2016.

**Answer:**

Respectfully submitted,  
**Cogan & Power, P.C.**

By:

  
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